

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHAKESQUE SINGLETARY,

Plaintiff,

vs.

**ATTORNEY DECLARATION IN
SUPPORT OF REQUEST FOR A
DEFAULT**

23 Civ. 02001 (JHR)

CITY OF NEW YORK, et al.

Defendants.

STEWART LEE KARLIN, ESQ., attorney for Plaintiff, SHAKESQUE SINGLETARY, an attorney admitted to practice in the State of New York affirms the truth of the following under penalties of perjury:

1. I am the attorney for plaintiff, SHAKESQUE SINGLETARY, in the above-captioned action and as such am fully familiar with the facts and circumstances as set forth below.
2. Plaintiff submits this declaration in support of Plaintiff's motion for an order entering a default judgment against Defendant, FRANK HONAN, pursuant to Federal Rule of Civil Procedure 55(b)(1), and for such other relief as this court may deem just and proper.
3. This action was commenced pursuant to Title VII of the Civil Rights Act of 1964 as amended 42 U.S.C. 2000e et seq., 42 U.S.C. § 1981 ("Section 1981"); race discrimination and retaliation provisions of the New York State Human Rights Law, New York State Executive Law, § 296 et seq. ("NYSHRL"); and the race discrimination and retaliation provisions of the New York City Administrative Code, § 8-107
4. The Complaint (Docket #3) was filed on March, 9, 2023, and a Summons (Docket #7) was issued by the Court on March 13, 2023.

5. The Summons and Complaint was properly served on Defendant, CITY OF NEW YORK, on May 13, 2023, under Fed. R. C. P.
6. Defendant, CITY OF NEW YORK, timely appeared and filed their Answer (Docket # 12) on May 25, 2023.
7. The Summons and Complaint was properly served on Defendants, GLENN BAGGS and MILAGROS CRUZ, on May 18, 2023, under Fed. R. C. P., and proof of service having been filed with the court on May 26, 2023 (Docket #15 and 16).
8. Defendants, GLENN BAGGS and MILAGROS CRUZ, timely appeared and filed their Answer (Docket # 21) on June 29, 2023.
9. The Summons and Complaint was properly served on Defendant, FRANK HONAN, on May 18, 2023, under Fed. R. C. P., and proof of service having been filed with the court on May 26, 2023 (Docket #14).
10. Defendant, FRANK HONAN, failed to timely respond to the Complaint. The time for Defendant, FRANK HONAN, to answer or otherwise move with respect to the complaint herein has expired on June 8, 2023.
11. Defendant, FRANK HONAN, has not answered or otherwise moved with respect to the complaint, and the time for Defendant, FRANK HONAN, to answer or otherwise move has not been extended.
12. That Defendant, FRANK HONAN, is not an infant or incompetent. Defendant, FRANK HONAN, is not presently in the military service of the United States as appears from facts in this litigation.
13. Plaintiff, SHAKESQUE SINGLETARY, has suffered pain and suffering damages and punitive damages in an amount to be determined by the Court at a hearing.

14. An inquest into damages is necessary as Plaintiff has suffered compensatory damages under applicable law, specifically, Title VII of the Civil Rights Act of 1964, 1981, the New York City Human Rights Law, and the New York State Human Rights Law.

15. Plaintiff now moves for an order entering a default judgment against Defendant, FRANK HONAN, pursuant to Federal Rule of Civil Procedure 55(b)(1), and for such other and further relief as this court may deem just and proper.

WHEREFORE, Plaintiff, SHAKESQUE SINGLETARY, respectfully requests that his motion for a default judgment against Defendant, FRANK HONAN, be granted and any other relief that is just and equitable.

Dated: New York, New York
July 14, 2023

STEWART LEE KARLIN
LAW GROUP, P.C.

A handwritten signature in black ink, appearing to read 'Stewart Lee Karlin', is written over a horizontal line.

Stewart Lee Karlin, Esq.
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